

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

**COLLEGE REPUBLICANS OF THE
UNIVERSITY OF WASHINGTON;
CHEVY SWANSON**, an Individual,

Plaintiffs,

vs.

ANA MARI CAUCE, in her official capacity
as president of the University of
Washington; **ET AL.**

Defendants.

CASE NO. C18-189-MJP

**DECLARATION OF WILLIAM J.
BECKER JR. IN SUPPORT OF
PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING
ORDER**

Note On Mot. Cal.: March 30, 2018

Judge: Hon. Marsha J. Pechman
Date: April 17, 2018
Time: 10:00 a.m.
Crtrm.: Suite 14206, United States
Courthouse, 700 Stewart
Street, Seattle, WA 98101-
9906

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2 I, William J. Becker, Jr., declare as follows:

3
4 1. I am lead counsel for Plaintiffs herein awaiting approval of my application for
5 pro hac vice admission to the Western District. I am located and doing business in Los
6 Angeles, California.

7
8 2. The following facts and circumstances are personally known to me, and if
9 called upon to do so, I could and would competently testify as to them.

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11 3. This declaration is presented in support of Plaintiffs' Motion for a Preliminary
12 Injunction.

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14 4. The "Central Plaza" at UW is also known as Red Square after its red brick
15 paving. (A true and correct copy of the Campus Map with a legend stating this fact that I
16 obtained from the internet is attached hereto as Exh. 1 and incorporated herein by reference
17 in full.)

18
19 5. Defendant Vinson has acknowledged on the radio the distinction between
20 security fee costs for speakers who do not attract hostile protesters and those that do and
21 that the cost of an appearance by controversial figure Milo Yiannopolous at UW would
22 exceed \$9,000 due to protests that occurred during his appearance there in 2017, but
23 controversial Black Lives Matter activist Shaun King, who appeared on campus without
24 encountering protests, would be charged about \$4,000 if he were to return to campus. A true
25 and correct copy of the transcript I prepared of Chief Vinson's appearance on the Jason Rantz
26 Show is attached hereto as Exh. 2 and incorporated herein by reference in full. The audio can
27

1 be accessed at: The Jason Rantz Show, "UW Security Policy Might Be Unfair To Conservative
2 Groups," January 26, 2018; [http://mynorthwest.com/881961/uw-security-policy-unfair-](http://mynorthwest.com/881961/uw-security-policy-unfair-conservatives/)
3 [conservatives/](http://mynorthwest.com/881961/uw-security-policy-unfair-conservatives/).
4

5 I declare under penalty of perjury under the laws of the State of Washington that the
6 foregoing is true and correct.

7 DATED this 7th day of March, 2018, at Los Angeles, California.
8

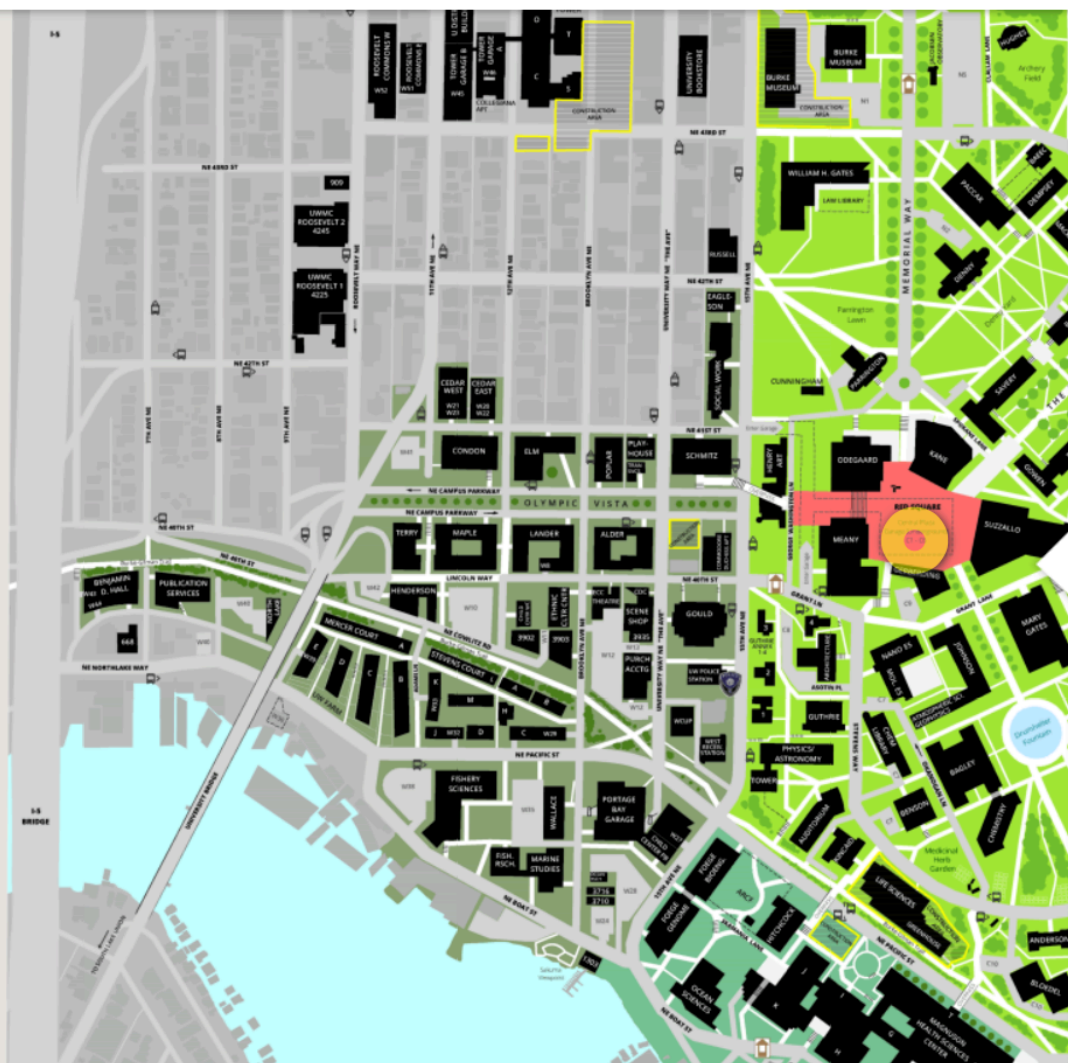
9 /s/ WILLIAM J. BECKER, JR.
10 WILLIAM J. BECKER, JR.

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that on this 7th day of March, 2018, I electronically filed the foregoing
13 document with the Clerk of the United States District Court using the CM/ECF system which
14 will send notification of such filing to all parties who are registered with the CMECF system.
15

16 DATED this 7th day of March, 2018

17 By: /s/ WILLIAM J. BECKER, JR.
18 William J. Becker, Jr. (Pro Hac Vice)
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[Students](#)
[Parents](#)
[Faculty & Staff](#)
[Alumni](#)


Central Plaza (LNDMK-2)

Also known as Red Square after its red brick paving, this large plaza is really the central gathering place on campus, connecting the arts at Meany Theater with Odegaard and Suzzallo libraries and the classrooms in Kane Hall.

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uw.edu/maps/?ln
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The Jason Rantz Show
“UW Security Policy Might Be Unfair To Conservative Groups”
Transcript of Interview with Chief Vinson
January 26, 2018

(<http://mynorthwest.com/881961/uw-security-policy-unfair-conservatives/>)

Jason Rantz:

Welcome back to Jason Rantz on AM 770 KTTH 94.5 FM from the greater east side. A new security policy at the university of Washington has campus clubs paying for the security of their events. Security requirements that can change depending on how controversial event become. Security requirements that can be so expensive it ends up canceling the event itself, at least that is the allegation this week UW College Republicans President stopped by the show to say that this policy has the effect of stifling conservative speech so this morning we now get the university side of things joining me on the line is the chief of police for the university of Washington John Vinson chief Vinson thank you so much for joining me this morning.

John Vinson:

Thanks very much for having me.

Jason Rantz:

So what's the impetus for this new policy.

John Vinson:

Actually it's not a new policy we've just memorialize the policy and put a few sort of coordinated approaches in place to ensure that we're on the same page across the university in terms of what the expectations are for students holding events on campus.

Jason Rantz:

so it sounds like the general expectation is you will do a review of the event in question, you'll get a general sense as to whether or not you believe that this is going to necessitate you know extraordinary amounts of security due to maybe something that happened at different campuses across the country, at similar events, and then you come up with a plan on how you want to keep everyone safe.

John Vinson:

That is correct.

Jason Rantz:

Okay why should a club pay for expensive security when its political opponents of theirs potentially causing the problems.

John Vinson:

Well the protocol is the same for all groups that have events on the UW campus. UW affiliated or not. So that's the protocol we have in place based upon the complete evaluation regarding security needs, so if it's a non UW affiliated group that has an event on campus and we believe based upon all the information we outline there is an additional security requirements then the group would be also required to pay those additional costs because our number one goal is to ensure that the environment is safe and secure for all members to attend.

Jason Rantz:

Is it fair to say that based on your experience at the UW that the events that tend to necessitate more security are due to progressive activists getting upset at a speech rather than the conservative activists getting upset at a speech.

John Vinson:

I don't necessarily categorize them into those different categories because even within those groups its a spectrum of individuals who perhaps may not be pigeonholed into those poor opposite perspective, so I would just suggest that our concern is to ensure there is an opportunity for all sides to have an equal voice and that additional presence is necessary to ensure the safety security for everyone.

Jason Rantz:

Okay well then to that point about a year ago Milo Yiannopoulos went on campus to give a speech. he was vita by the UW College Republicans and there was a large contingency of activists who did not want Milo to speak, in fact they help to block access to the actual building and violence did end up breaking out. Unfortunately there was a shooting and in this case it was a shooting against a activist who was there protesting the Milo Yiannopoulos speech. now the security at that point was about nine thousand dollars. Based on what you saw that last event of Milo was invited back is it fair to say that the cost would likely be more than nine thousand dollars.

John Vinson:

Well let me just clarify we actually charged them nine thousand dollars. The UW costs was over twenty - twenty one thousand dollars and then SPD had some significant costs associated with helping us police that event. yes if Milo comes back, the costs would be more than the nine thousand dollars that the College Republicans paid for that particular event.

Jason Rantz:

And he's a controversial speaker, he certainly understands that and that's part of his brand. At the same time Shawn king was also recently at the UW. He's made incredibly racially insensitive remarks he routinely takes positions that are incredibly offensive and anti cop. He is a controversial figure. What was a security costs for the Shawn king about.

John Vinson:

Let me pull up my notes here... I think it was roughly around four thousand, four thousand dollars.

Jason Rantz:

Okay.

John Vinson:

That we actually charged to the event. They only had about nine hundred people in attendance.

Jason Rantz:

And why was it at that point. So give us a sense of what that security was for and how it was utilized for the event.

John Vinson:

It was a for the same protocol. They did an assessment, they looked at his previous visits on campus if he had some, what had happened across the country and other venues, the sponsor of the event, and the date and time of the event, and where the location of the event was held so there are multiple sort of checklists or elements that we use to evaluate the totality of the circumstances and what's required under those particular situations.

Jason Rantz:

I don't remember any of the coverage of this I'm going to assume that the reaction towards as Shawn King was different than the reaction towards Milo, is that correct?

John Vinson:

That correct. When we think about these events our our number one goal is to always prepare, you know, for the worst case scenario and all the planning that we do for all the events on campus.

Jason Rantz:

But now I'll ask the same question about Shawn King that I did about Milo. Given what happened at the Shawn King if he comes back next year would you charge more, would you foresee charging more than the four thousand or so.

John Vinson:

Wall when Shawn King was on campus last year I don't believe anything occurred at his event, so that would sort of be the baseline that would occur. I do know our overall recharge rates have increased so I know it would be slightly more than what was last year but assuming all things were equal, there were no issues, it was totally peaceful so we would sort of keep the same sort of template of policing of security plans unless something happens in a previous location or we get additional information that dictates the exploring of additional resources.

Jason Rantz:

And that's where chief Vinson, I make my point and I think the College Republicans make their point that this kind of policy has the impact that is disparate. That the Republican groups on campus and the conservative groups on campus on what would I think most people say a liberal college campus will be subject a higher fees because their events will be deemed way more controversial to the general campus population and that when Milo shows up, controversial figure, the left on campus, the activists on campus they go nuts, they protest outside, they block people from getting in and yet when there are progressive speakers on campus the conservatives are not doing what the progressive activists are doing. Shawn King is able to speak. There's no protest preventing them from from getting in, in fact the conservative groups, they showed up to the event and they asked some questions of Shawn king, and so when you look at this kind of policy, How can, how can the policy, how can the school take the position that it doesn't impact the conservative groups more than the liberal groups when it would appear the liberal activists on campus are more likely than the conservative ones to create a need for actual security.

John Vinson:

That's a very good question and in our world we don't necessarily categorize the group as conservative or liberal.

Jason Rantz:

Oh I know you don't. I give total credit to you because you know this about me, I'm very much in favor of the cops and you are no exception. so I have a deference towards you guys, but I think that this policy has the effect regardless of whether or not you identify an organization has leftist or right or aside from that, that's the effect it has.

John Vinson:

I definitely understand your perspective, but from a policing or security standpoint it's unfortunate that some events do generate additional challenges for law enforcement and unfortunately in some of those venues or or during some of those events we cannot control who shows up.

Jason Rantz:

Just joining now, talking with the chief of police for the university of Washington police department. John Vincent is on the line we're talking about a policy that is in place that requires

clubs to pay for a good portion at least of the security involved in individual events act. Does the administration take into account in the conversations you had with them about its impact on the diversity of the events that are able to go on or do they just do they keep you out of that conversation.

John Vinson:

Oh we're definitely involved in those conversations and we want to work with all the groups to ensure that they can have their events on our campus, but like I said before it's one of those delicate balances of ensuring that the appropriate amount of resources are available to manage any of that and they're more importantly who's responsible to cover those resources.

Jason Rantz:

If there's an event that's on campus and it's overtly progressive in nature it's an AntiFa protest or something like that and I go on the air and I say I want a thousand people who are just vehemently against this kind of organization on campus, I'm gonna bring them to the campus we're gonna protest outside the event, we're gonna you know, we're gonna be loud. if I were to say that does that give you the ability to then add more security and charge more to the club?

John Vinson:

Well we wouldn't necessarily assume that just because more people are showing up to protest requires additional police presence. Again it's a totality of the circumstances, it's what has happened in the past we conduct a security assessment of at that time and that we make a determination based on the security needs.

Jason Rantz:

And that's what I expected the answer to be and so here's my question then: what's to stop anyone from weaponizing this policy? What's to stop me from going on air and basically doing that the next time that there's a speech because I want to raise the amount of money that the club is going to have to put up in order to go through with their event. Because that's what I fear is going to happen against the conservative groups on campus. The next time someone comes up all some activist group on campus has to do to silence it is to start a Facebook page, invite ten thousand people but to claim that they're gonna show for protests, and then all of a sudden you look at that you say okay well man I I got to do this because I want to do what's best for the kids and what's best for the safety on campus I'm gonna have to charge you five thousand six thousand seven thousand dollars more to protect you. Can't this policy be weaponized?

John Vinson:

No, that's not necessarily how this works. I mean, we don't just respond to radio communications like that again. We look at the history of the events, what's been happening and we've seen a situation where there have been Facebook post of a significant turn out that's supposed to occur

and that did not change how we planned our overall security in terms of additional resources. We consider that, but we still look at what we knew at the time what had happened at previous events, what had happened across the country, and then we explored what other resources are necessary if for example an un-anticipated group of individual show up, so it's not where you would go on line and say, 'well show up down at the UW, bring ten thousand people' We would just not increase the cost, that's not how it works, we look at the totality of the circumstances and we would make adjustments if necessary.

Jason Rantz:

There you go, that again it is the policy that's in place right now at the university of Washington. We've been talking with the chief of police for the university of Washington is name is John Vinson and they offered him up to me because they know I'm all happy with the cops and I won't yell at him as much as I normally would any other UW administrator. Chief Vincent, I appreciate you stopping by this morning.

John Vinson:

Absolutely.